

1 ROB BONTA  
Attorney General of California  
2 MARK R. BECKINGTON  
Supervising Deputy Attorney General  
3 ROBERT L. MEYERHOFF, SBN 298196  
GABRIELLE D. BOUTIN, SBN 267308  
4 S. CLINT WOODS, SBN 302439  
CHARLES J. SAROSY, SBN 302439  
5 Deputy Attorneys General  
300 South Spring Street, Suite 1702  
6 Los Angeles, CA 90013-1230  
Telephone: (213) 269-6177  
7 Fax: (916) 731-2144  
E-mail: Robert.Meyerhoff@doj.ca.gov  
8 *Attorneys for Rob Bonta in his official capacity as  
Attorney General of the State of California*

9 IN THE UNITED STATES DISTRICT COURT  
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
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14 **LANCE BOLAND, AN INDIVIDUAL;  
MARIO SANTELLAN, AN  
15 INDIVIDUAL; RENO MAY, AN  
INDIVIDUAL, JEROME  
16 SCHAMMEL, AN INDIVIDUAL; AND  
CALIFORNIA RIFLE & PISTOL  
17 ASSOCIATION,  
INCORPORATED, A CALIFORNIA  
18 CORPORATION;**

19 Plaintiffs,

20 v.

21 **ROBERT BONTA, IN HIS OFFICIAL  
CAPACITY AS ATTORNEY GENERAL  
22 OF CALIFORNIA,**

23 Defendant.  
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Case No. 8:22-cv-01421-CJC-ADS

**STIPULATION RE: SCHEDULING  
ORDER**

Courtroom: 9B  
Judge: Hon. Cormac J. Carney  
Action Filed: August 1, 2022  
Trial Date: February 27, 2024

1 Plaintiffs Lance Boland, Mario Santellan, Reno May, Jerome Schammel, and  
2 California Rifle & Pistol Association, Inc. (Plaintiffs) and Defendant Rob Bonta in  
3 his official capacity as Attorney General of California (Defendant, and together  
4 with Plaintiffs, the Parties) hereby stipulate and agree as follows:

5 **WHEREAS**, on November 15, 2022, Plaintiffs filed their Motion for  
6 Preliminary Injunction (the Motion) (Dkt. 23);

7 **WHEREAS**, on December 8, 2022, this Court entered a Scheduling Order in  
8 this matter (Dkt. No. 32), setting a discovery cut-off of October 19, 2023, a  
9 deadline for all non-discovery motions of December 18, 2023, and a trial date of  
10 February 27, 2024;

11 **WHEREAS**, on March 20, 2023, the Court granted Plaintiffs' Motion for a  
12 Preliminary Injunction (Dkt. No. 60), but stayed the effect of the preliminary  
13 injunction for fourteen (14) days so that Defendant could "file an appeal and seek a  
14 further stay of this preliminary injunction" (Dkt. No. 61);

15 **WHEREAS**, on March 27, 2023, Defendant filed a notice of appeal to the  
16 Ninth Circuit Court of Appeals of the order granting the preliminary injunction  
17 (Dkt. No. 62), and an emergency motion for a partial stay of the preliminary  
18 injunction pending appeal (9th Cir. Dkt. No. 2-1);

19 **WHEREAS**, on March 31, 2023, the Ninth Circuit granted Defendant's  
20 motion for a partial stay pending appeal, ordered the opening brief in the appeal to  
21 be filed on April 28, 2023, the answering brief to be filed by May 26, 2023, and the  
22 optional reply brief to due within twenty-one (21) days of the filing of the  
23 answering brief; the Ninth Circuit additionally stated that no streamlined extensions  
24 of time would be approved, and ordered the clerk to place the appeal on the next  
25 available calendar upon the completion of briefing (Dkt. No. 64);  
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1       **WHEREAS**, on May 3, 2023, the Ninth Circuit informed the parties that the  
2 appeal was being considered for oral argument in August, September, or October of  
3 2023;

4       **WHEREAS**, the Ninth Circuit's resolution of the appeal of that order granting  
5 the preliminary injunction may provide guidance to the Parties and to the Court  
6 with respect to Plaintiffs' claims and the scope of relevant discovery;

7       **WHEREAS**, because the Ninth Circuit is likely to hear argument in August,  
8 September, or October, it appears probable that without intervention from this  
9 Court, discovery will close and the parties will need to start drafting (and  
10 potentially file) dispositive motions before the appeal is resolved;

11       **WHEREAS**, the Parties believe that vacating the Scheduling Order (Dkt. No.  
12 32) and entering a new scheduling order setting new deadlines based on the  
13 resolution of the Ninth Circuit appeal and modeled on the timing of the original  
14 Scheduling Order will properly conserve the resources of the parties and this Court  
15 while also not needlessly delaying a determination by this Court of the underlying  
16 merits of Plaintiffs' claims;

17       **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by the  
18 Parties that, with the Court's permission, that the original Scheduling Order be  
19 vacated, and a new scheduling order be entered providing the following:

- 20       • All discovery (including discovery motions) shall be completed ninety (90)  
21       days after issuance of the mandate in the appeal of the Court's order granting  
22       preliminary injunction;
- 23       • The parties are referred to ADR Procedure No. 1—Magistrate Judge, have  
24       until fourteen (14) days after the close of discovery to conduct settlement  
25       proceedings, and shall file a Joint Status Report no later than five (5) days  
26       after the ADR proceeding is completed advising the Court of their settlement  
27       efforts and status;

- The parties shall have until sixty (60) days after the close of discovery to file and have heard all other motions;
- The case shall be set for trial on a date convenient for the Court at least seventy-five (75) days after the deadline for all non-discovery motions; and
- The pretrial conference shall be set on a date convenient to the Court at least fourteen (14) days prior to the trial date.

Dated: May 25, 2022

Respectfully submitted,

ROB BONTA  
Attorney General of California  
MARK R. BECKINGTON  
Supervising Deputy Attorney General

/s/ Robert L. Meyerhoff  
ROBERT L. MEYERHOFF  
Deputy Attorney General

*Attorneys for Rob Bonta in his official  
capacity as Attorney General for the  
State of California*

Dated: May 25, 2022

Respectfully submitted,

/s/ Joshua Robert Dale  
C.D. MICHEL  
JOSHUA ROBERT DALE  
ALEXANDER A. FRANK  
KONSTADINOS T. MOROS

Michel & Associates, P.C.

*Attorneys for Plaintiffs Lance Boland,  
Mario Santellan, Reno May, Jerome  
Schammel, and the California Rifle &  
Pistol Association, Incorporated*

## CERTIFICATE OF SERVICE

Case Name: Boland, et al. v. Bonta

No. 8:22-cv-01421-CJC-ADS

I hereby certify that on May 25, 2023, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

### STIPULATION RE: SCHEDULING ORDER

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on May 25, 2023, at Los Angeles, California.

Robert Leslie Meyerhoff

Declarant

Robert M

Signature